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FILED
DISTRICT COURT OF GUAM

OCT 31 2006 *hba*

MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT OF GUAM

NIPPO CORPORATION,

Plaintiff,

vs.

INTERNATIONAL BRIDGE CORPORATION,
INTERNATIONAL BRIDGE AND
CONSTRUCTION/MARIANAS, INC., INTER
BAY CIRCLE MASRINE, AND WILLIAM E.
TOELKES,

Defendants.

CIVIL CASE NO. 06-00020

JOINT DISCOVERY PLAN

INTERNATIONAL BRIDGE CORPORATION,
AND INTERNATIONAL BRIDGE AND
CONSTRUCTION/MARIANAS, INC.,

Counterclaimants,

vs.

NIPPO CORPORATION,

Counterclaim Defendants.

ORIGINAL

The parties having met and conferred hereby submit their proposed Joint Discovery Plan in accordance with Rule 26(f) of the Federal Rules of Civil Procedure and Local Rule 16.1(b).

A. **Initial Disclosures**

In accordance with Rule 26(f), the parties stipulate that they shall complete their initial disclosures in accordance with Rule 26(a)(1) of the Rules of Civil Procedure on or before **November 30, 2006**.

B. **Interrogatories, Requests for Production and Admissions**

Interrogatories, Requests for Production and Requests for Admissions may be propounded at any time during the discovery phase, subject to the limitations on the number of interrogatories as set forth in Rule 33, provided that the discovery requests must be served sufficiently in advance that responses are due prior to the expiration of the discovery cutoff date.

C. **Fact Witnesses and Depositions**

Because of the large number of separate projects involved in this lawsuit, there are potentially dozens of fact witnesses who may need to be deposed. The parties agree that each party may depose up to seven fact witnesses per project. If the parties determine that additional fact witnesses are required for any particular project, they shall advise the Court and seek leave to take additional depositions. Depositions of fact witnesses shall be conducted prior to the expiration of the discovery cutoff date.

D. **Expert Designation and Reports**

1. Plaintiff shall designate its experts and serve their reports in accordance with Rule 26(a)(2)(B) on or before **September 10, 2007**.

2. Defendant shall designate its experts and serve their reports in accordance with Rule 26(a)(2)(B) on or before **October 29, 2007**.

3. Plaintiff shall designate its rebuttal experts, if any, and serve their reports in accordance with Rule 26(a)(2)(B) on or before **November 26, 2007**.

E. **Expert Depositions**

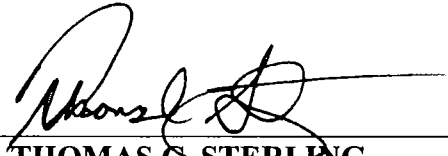
Depositions of all testifying experts will be scheduled to take place during the months of **October, 2007 through December, 2007**, unless the parties agree to earlier dates.

F. **Discovery Completion**

The parties anticipate that all necessary discovery can be completed by **January 18, 2008**.


**BLAIR STERLING JOHNSON MOODY
MARTINEZ & LEON GUERRERO**

Date: October 13, 2006

By: 
THOMAS C. STERLING
*Attorneys for Plaintiff/Counterclaim
Defendant*

CIVILLE & TANG, PLLC

Date: October 13, 2006

By: 
G. PATRICK CIVILLE
*Attorneys for Defendants/
Counterclaimants*

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OCT 13 2006

**DISTRICT COURT OF GUAM
HAGATNA, GUAM**